



Suite 2300
1300 SW Fifth Avenue
Portland, OR 97201-5630

Mark P. Trinchero
503.778.5318 tel
503.778.5299 fax

marktrinchero@dwt.com

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IDAHO PUBLIC
UTILITIES COMMISSION

December 13, 2010

TMW-T-10-a

VIA UPS

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
P.O. Box 83720
Boise, ID 83720

Re: T-Mobile West Corporation's Application for Designation as an Eligible
Telecommunications Carrier

Dear Ms. Jewell:

Enclosed please find the original plus seven (7) copies of T-Mobile West Corporation's
Application for Designation as an Eligible Telecommunications Carrier.

Please note the enclosed filing contains confidential trade secret information that is exempt from
public disclosure pursuant to Section 9-340D(1), Idaho Code. Pursuant to Rule 67 of the rules of
Procedure of the Idaho Public Utilities Commission, the enclosed Confidential Information has
been submitted on yellow paper and should not be posted to the Commission's website.

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trinchero

MPT:bl
Enclosures

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IDAHO PUBLIC
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of T-
Mobile West Corporation For Designation)
as an Eligible Telecommunications)
Carrier Pursuant to 47 U.S.C. § 214(e)(2))

Case No. TMW-T-10-01
T-MOBILE APPLICATION

**APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

T-Mobile West Corporation ("T-Mobile" or "Company") hereby submits this Application for Designation as an Eligible Telecommunications Carrier ("ETC"), pursuant to 47 U.S.C. § 214(e), and the Idaho Public Utilities Commission's ("Commission") ETC designation requirements¹ for the purpose of receiving federal universal service support. As explained herein, the public interest would be served by granting this Application, thereby enabling T-Mobile to advance universal service by serving the basic and advanced communications needs of rural and low-income consumers.

T-Mobile is a facilities-based wireless telecommunications carrier in Idaho serving the basic telephone and advanced broadband needs of consumers. The Company uses radio licenses issued by the Federal Communications Commission ("FCC") to an affiliate to provide Commercial Mobile Radio Service ("CMRS") in its requested designated service area, which includes the wire centers of the non-rural incumbent local exchange carriers ("ILECs") and study

¹ See *In the Matter of the Application of WWC Holding Co., Inc. dba CellularOne Seeking Designation as an Eligible Telecommunications Carrier That May Receive Federal Universal Service Support*, Order No. 29841, Appendix pp. 1-3 (IPUC Case No. WST-T-05-1, served August 4, 2005)(hereinafter "*IPUC ETC Requirements Order*").

areas (including all wire centers therein) of the rural ILECs listed in Attachment A². Upon designation as an ETC, T-Mobile will provide the supported services throughout the requested designated service areas and offer Lifeline service to qualified low-income consumers, thereby advancing universal service in Idaho.

I. Requirements For Designation As An ETC

T-Mobile meets the requirements for designation as an ETC as established under federal law and FCC rules [47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)] and state regulations. In particular, T-Mobile:

- is a common carrier [*see* 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)];
- will offer the services supported by federal universal service support mechanisms as defined in 47 C.F.R. § 54.101(a) [*see* 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)];
- will use its own facilities to provide the supported services [*see* 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)];
- will provide the supported services throughout its designated service area [*see* 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)];
- will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution [*see* 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)];
- will make available Lifeline service to qualifying low-income consumers [47 C.F.R. § 54.405];
- submits Attachment B, a substantive plan of investments to be made with universal service support funds during the first two years of support and a substantive description of how those expenditures will benefit customers, including how service quality, signal coverage, and network capacity will be maintained and improved and how many customers will be benefited. [*see IPUC ETC Requirements Order*, App., at 2-3]; and

² Attachment A also includes a map showing the wire centers included in the proposed ETC area.

- submits Attachment C, a map of its proposed ETC service areas (showing ILEC exchange boundaries) with existing and planned locations of cell sites and shading to indicate where T-Mobile plans to provide CMRS signals.

A. T-Mobile Is A Common Carrier

T-Mobile provides CMRS throughout its requested designated service area, and as a CMRS provider, T-Mobile is regulated as a common carrier [47 C.F.R. § 20.9], subject to all applicable regulations, and therefore meets the ETC requirement of being a common carrier.

B. T-Mobile Offers The Services Supported By Federal Universal Service Support Mechanisms

T-Mobile provides each of eight services supported by federal universal service support mechanisms and will provide toll-limitation service for qualifying low-income consumers upon designation as an ETC as set forth below.

1. Voice Grade Access To The Public Switched Telephone Network - the ability to transmit and receive voice communications with a minimum bandwidth of 300 to 3,500 Hertz [47 C.F.R. § 54.101(a)(1)]. T-Mobile meets this requirement through its provision of mobile voice communications service and interconnection to the public switched telephone network.
2. Local Usage – an amount of minutes of use provided free of charge [47 C.F.R. § 54.101(a)(2)]. T-Mobile meets this requirement by providing an amount of local usage free of charge in each universal service rate plan.
3. Dual Tone Multi-Frequency (“DTMF”) Signaling Or Its Functional Equivalent – a method of signaling that facilitates the transportation of call set-up and call detail information [47 C.F.R. § 54.101(a)(3)]. T-Mobile meets this requirement by providing out-of-band digital signaling and in-band multi-frequency signaling for call set-up and termination.
4. Single Party Service Or Its Functional Equivalent – a dedicated message path for the length of a user’s particular transmission [47 C.F.R. § 54.101(a)(4)]. T-Mobile meets this requirement by providing a dedicated, non-shared, frequency path for each voice call.
5. Access To Emergency Services – access to emergency services includes both access to 911 and E911 services to the extent the local government has implemented such services [47 C.F.R. § 54.101(a)(5)]. T-Mobile

meets this requirement by providing 911 service and meeting all requests for E911 service from local public service answering points ("PSAPs").

6. Access To Operator Services – access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call [47 C.F.R. § 54.101(a)(6)]. T-Mobile meets this requirement by providing operator services to its customers either directly or through third party arrangements.
7. Access To Interexchange Service – ability to make and receive calls using an interexchange carrier's network [47 C.F.R. § 54.101(a)(7)]. T-Mobile meets this requirement by providing its customers with the ability to make and receive calls over interexchange network facilities. The FCC has determined that wireless carriers are not required to provide equal access to interexchange service, but may be required to provide equal access in certain special situations.³
8. Access To Directory Assistance – making available to customers, among other services, information contained in directory listings. T-Mobile meets this requirement by providing all of its customers with access to directory listings by dialing "411" or "555-1212."
9. Toll Limitation For Qualifying Low-Income Consumers – toll limitation means both toll blocking and toll control, or, if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control [47 C.F.R. § 54.101(a)(9); 47 C.F.R. § 54.400(d)]. Upon implementing its Lifeline service offering, T-Mobile will offer toll limitation to qualifying low-income consumers at no additional charge.

C. T-Mobile Will Use Its Own Facilities To Provide The Supported Services

T-Mobile is a facilities-based wireless telecommunications carrier with its own switching, transport, cell sites, and associated telecommunications facilities in its proposed designated ETC service area. While an ETC can meet its universal service obligations by combining its own facilities with the resale of another carrier's services, T-Mobile intends to use its own facilities to meet its universal service obligations. As an ETC, T-Mobile will use universal service support to support and enhance its network facilities in its proposed designated

³ See In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, ¶ 71, FCC 97-157 (released May 8, 1997) ("*Universal Service Order*").

service area. A substantive plan of investments to be made with universal service support funds during the first two years of support and a substantive description of how those expenditures will benefit customers, including how service quality, signal coverage, and network capacity will be maintained and improved, and how many customers will be benefited, is appended hereto as Attachment B.

D. T-Mobile Will Provide The Supported Services Throughout Its Designated Service Areas

T-Mobile commits to provide the supported services throughout its designated service area, consistent with all applicable requirements, including the FCC's ETC service provisioning requirements found in 47 C.F.R. § 54.202. To the extent T-Mobile's network already covers a potential customer's premises, T-Mobile will provide service on a timely basis. For instances where a request comes from a potential customer within T-Mobile's licensed service area but outside its existing network coverage, T-Mobile will provide service within a reasonable period of time by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service; or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment. If T-Mobile determines that it cannot reasonably serve a consumer, then it will report the unfulfilled request within thirty (30) days after making such determination.

E. T-Mobile Will Advertise The Availability Of Its Universal Service Offerings And Charges For Such Offerings Using Media Of General Distribution

T-Mobile commits to advertise the availability of, and charges for, the supported services using media of general distribution. T-Mobile currently offers and advertises its wireless telecommunications services, including those offerings that include all of the supported services,

using radio, television, billboards, print, internet, and targeted mailings. In addition, T-Mobile maintains various retail stores and authorized agent locations throughout its proposed ETC designated service area. T-Mobile will use appropriate media outlets to advertise its universal service offerings in a manner consistent with applicable requirements.

F. T-Mobile Will Make Available Lifeline Service To Qualifying Low-Income Consumers

Upon designation as an ETC, T-Mobile will make available to qualified low-income consumers a discounted service offering that meets all applicable Lifeline requirements. Consumers rely on their mobile phones for their communications needs and qualifying low-income consumers are no exception. Low-income consumers would be the primary beneficiaries of T-Mobile's Lifeline service offering.

As implemented in other areas where the Company has been designated as an ETC, T-Mobile's planned Lifeline service offering, which is subject to change, will include:

- a low \$6.49 per month Lifeline rate⁴
- 145 Whenever Minutes⁵, 500 night minutes, and 500 weekend minutes per month, and an overage rate of \$0.05 per minute; and
- an affordable handset.

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⁴ The \$6.49 per month discounted Lifeline rate is based upon a non-discounted rate of \$19.99 per month minus a \$13.50 Lifeline discount. Eligible residents of tribal lands pay just \$1.00 a month to receive this plan.

⁵ Whenever Minutes[®] are minutes that can be used at any time and anywhere on T-Mobile's nationwide network.

G. Idaho Utilities And Transportation Commission Requirements For ETC Designation

1. Two-year plan:

Pursuant to the *IPUC ETC Requirements Order*, App. at 2, a plan of investments to be made with universal service funds during the first two years of support is included as Attachment B. The plan sets forth a description of the manner in which T-Mobile intends to invest the universal service funds to the benefit of customers that T-Mobile estimates it will receive in the first two years following designation as an ETC in the State of Idaho

2. Ability to function in emergency situations:

The Commission requires that wireless ETC applicants submit a plan demonstrating how it will function in an emergency.⁶ In particular, a wireless ETC applicant must demonstrate that it has “a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”⁷ T-Mobile’s plan is included as Attachment D.

3. Consumer protection and service quality standards:

The Commission requires wireless ETC applicants to commit to comply with the CTIA Code.⁸ T-Mobile is a strong supporter of, and abides by, the CTIA Consumer Code for Wireless Service. T-Mobile has been a signatory of the CTIA Consumer Code for Wireless Service since 2003 and was most recently certified as such in June 2010, as evidenced by the certification in Attachment E.

T-Mobile continues to earn accolades for its dedication to providing great customer service. On July 29, 2010, J.D. Power and Associates announced that T-Mobile was the sole

⁶ *IPUC ETC Requirements Order*, App. at 3.

⁷ *Id.*

⁸ *Id.*

wireless carrier to earn the highest ranking in their 2010 Wireless Customer Care Performance Study – Volume 2. On August 12, 2010, T-Mobile was recognized for the third consecutive time by J.D. Power and Associates for having earned its highest ranking in its independent Wireless Retail Sales Satisfaction Study – Volume 2. *See*, Attachment F.

4. Description of Local Usage Plans:

This Commission requires ETC applicants to submit local usage plans to show comparability to ILEC offerings. T-Mobile makes available several different rate plans with varying amounts of local usage that are comparable to the offerings of the ILECs. T-Mobile's price plans are set forth at www.t-mobile.com.

5. Tribal Notification:

The Commission requires ETC applicants seeking ETC designation for any part of tribal lands to provide a copy of its application to the affected tribal government or tribal regulatory authority, as applicable, at the time it files its application with the Commission.⁹ T-Mobile will comply with this requirement.

II. Designation of T-Mobile As An ETC Is In The Public Interest

T-Mobile meets all of the requirements for designation as an ETC by providing the supported services, committing to serve all consumers throughout its designated service area, offering a Lifeline service consistent with all applicable requirements, advertising the availability of its universal service offerings, and furthering the goals of the universal service program. Moreover, designation of T-Mobile as an ETC is in the public interest because consumers will benefit from competitive pricing and new services, such as T-Mobile's Lifeline Plan. As T-Mobile expands its network in Idaho, consumers will benefit from a high level of service quality

⁹ *IPUC ETC Requirements Order*, App. at 2.

and more service options. Furthermore, the designation will not adversely impact the universal service fund.

A. Benefits Of Increased Competition

The benefits of competition are widely recognized and extend to all markets, including the universal service market, as recognized by the FCC:¹⁰

We note that an important goal of the Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies. We agree with Western Wireless that competition will result not only in the deployment of new facilities and technologies, but will also provide an incentive to the incumbent rural telephone companies to improve their existing network to remain competitive, resulting in improved service to Wyoming consumers [consumers in the proposed ETC service area]. In addition, we find that the provision of competitive service will facilitate universal service to the benefit of consumers in Wyoming by creating incentives to ensure that quality services are available at “just, reasonable, and affordable rates.”

Consumers rely on wireless services for their telecommunications needs. T-Mobile’s designation as an ETC will result in consumers having greater access to wireless telecommunications services in rural areas, thereby advancing the basic goal of preserving and advancing universal service.¹¹ In rural areas, the universal service goal is clear:¹²

Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services, including interexchange services and advanced telecommunications and information services, that are reasonably comparable to those services provided in urban areas and that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.

¹⁰ In the Matter of the Federal-State Joint Board on Universal Service, Western Wireless Corp. Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, CC Docket No. 96-45, *Memorandum Opinion and Order*, DA. 00-2896, ¶ 17 (released December 26, 2000).

¹¹ See 47 U.S.C. § 254(b).

¹² 47 U.S.C. § 254(b)(3).

To accomplish this goal, a competitive universal service framework has been established with consumers benefiting from competing carriers vying for their business based upon price, service offerings, coverage, and service quality.

The Commission has similarly recognized the benefits of designating wireless carriers as ETCs in rural areas:

After reviewing Edge's Application and the comments in the case, we find that Edge has satisfied the requirements for designation as an ETC carrier in the 44 rural wire centers. We further find that the public interest will be served by designating Edge as an additional ETC in the proposed service area. We conclude that Edge's commitment to provide the universal services, its network improvement plan, its large local calling area, its record of investing in Idaho, and its plans to remain functional during emergencies all demonstrate that ETC designation is consistent with the public interest. Order Nos. 29841 at 4; 29541 at 6.¹³

T-Mobile is uniquely positioned, offering consumers great rate plan offerings and customer service in the marketplace. For example, T-Mobile has been consistently rated best in customer service by J.D. Power and Associates as recently as July 2010 and offers a variety of unlimited rate plans.

T-Mobile's designation as an ETC will enable the Company to bring these innovative and competitive services to additional consumers throughout its designated service area, providing another choice to consumers when they review incumbent carriers' service offerings, service quality, and customer service, to the benefit of these rural consumers.¹⁴

¹³ *In the Matter of the Petition of Edge Wireless, LLC for Designation as an eligible Telecommunications Carrier under 47 U.S.C. § 214(e)(2), Case No. EDG-T-07-01, Order No. 30360 at 14 (June 29, 2007).*

¹⁴ Due to the cap on universal service support payments to competitive carriers, T-Mobile's designation as an ETC will not increase the federal universal service fund.

III. Certification For Use Of Universal Service Funds

T-Mobile certifies that it will use federal high-cost universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, in accordance with 47 U.S.C. § 254(e). T-Mobile's high-cost certifications pursuant to 47 C.F.R. §§ 54.313(a) and 54.314(a) are included as Attachment G. To ensure that T-Mobile's receipt of federal universal service support is effective as of its designation date, it is requested that the Commission include language in the designation Order certifying T-Mobile's use of funds or provide a supplemental certification for T-Mobile's use of universal service support. FCC rules expressly provide for the filing of supplemental certifications for new ETC designations.

Conclusion

T-Mobile respectfully requests designation as an ETC for purposes of receiving federal universal service support. T-Mobile further requests that the Commission's Order granting ETC designation expressly state that T-Mobile's support "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." Inclusion of this language in the designation Order is required to ensure that the Universal Service Administration Company will deem T-Mobile eligible to receive support as of the date of issuance of the designation Order.

Dated this 10th day of December, 2010.

Respectfully submitted,

T-Mobile West Corporation

By: 

David Daggett, ISB #5936
DAVIS WRIGHT TREMAINE, LLP
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
(206) 757-8066

Mark P. Trinchero, OSB #88322
DAVIS WRIGHT TREMAINE LLP
1300 SW Fifth Avenue, Suite 2300
Portland, Oregon 97201
(503) 778-5318

Teri Ohta
Senior Corporate Counsel
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, Washington 98006
(425) 383-5532

T-MOBILE IDAHO ETC SERVICE AREA

Rural Telephone Company Study Areas	Study Area Code (SAC)	Wire Center
ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	472213	All
CENTURYTEL OF THE GEM STATE, INC.-ID	472223	All
CENTURYTEL OF THE GEM STATE, INC.-NV	552223	All
COLUMBINE TELCO DBA SILVER STAR COMMUNICATIPMS	462204	All
DIRECT COMMUNICATIONS ROCKLAND, INC.	472232	All
FARMERS MUTUAL TELEPHONE CO.	472221	All
FILER MUTUAL TELEPHONE CO.	472220	All
FREMONT TELCOM CO	472222	All
MALHEUR HOME TELEPHONE CO.	532456	All
MUD LAKE TELEPHONE COOPERATIVE ASSOICATION, INC.	472227	All
POTLATCH TELEPHONE CO., INC.	472230	All
PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.	472231	All
RURAL TELEPHONE CO.	472233	All
SILVER STAR TELEPHONE CO., INC.	472295	All
Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
QWEST CORPORATION	475103	AMFLIDMA
		BLFTIDMA
		BLSSIDMA
		BNCRIDMA
		BOISIDMA
		BOISIDNW
		BOISIDSW
		BOISIDWE
		BRLYIDMA
		BUHLIDMA
		CLWLIDMA
		CSFRIDMA
		DECLIDMA
		DWNYIDMA
		DYTNIDMA
		EAGLIDNM
		EDHZIDMA
		EMMTIDMA
		FKLNIDMA
		FRTHIDMA
		GDNGIDMA
		GLFYIDMA
		GRACIDMA
		HALYIDMA
		HGMNIDMA
		IDFLIDMA
		INKMIDMA

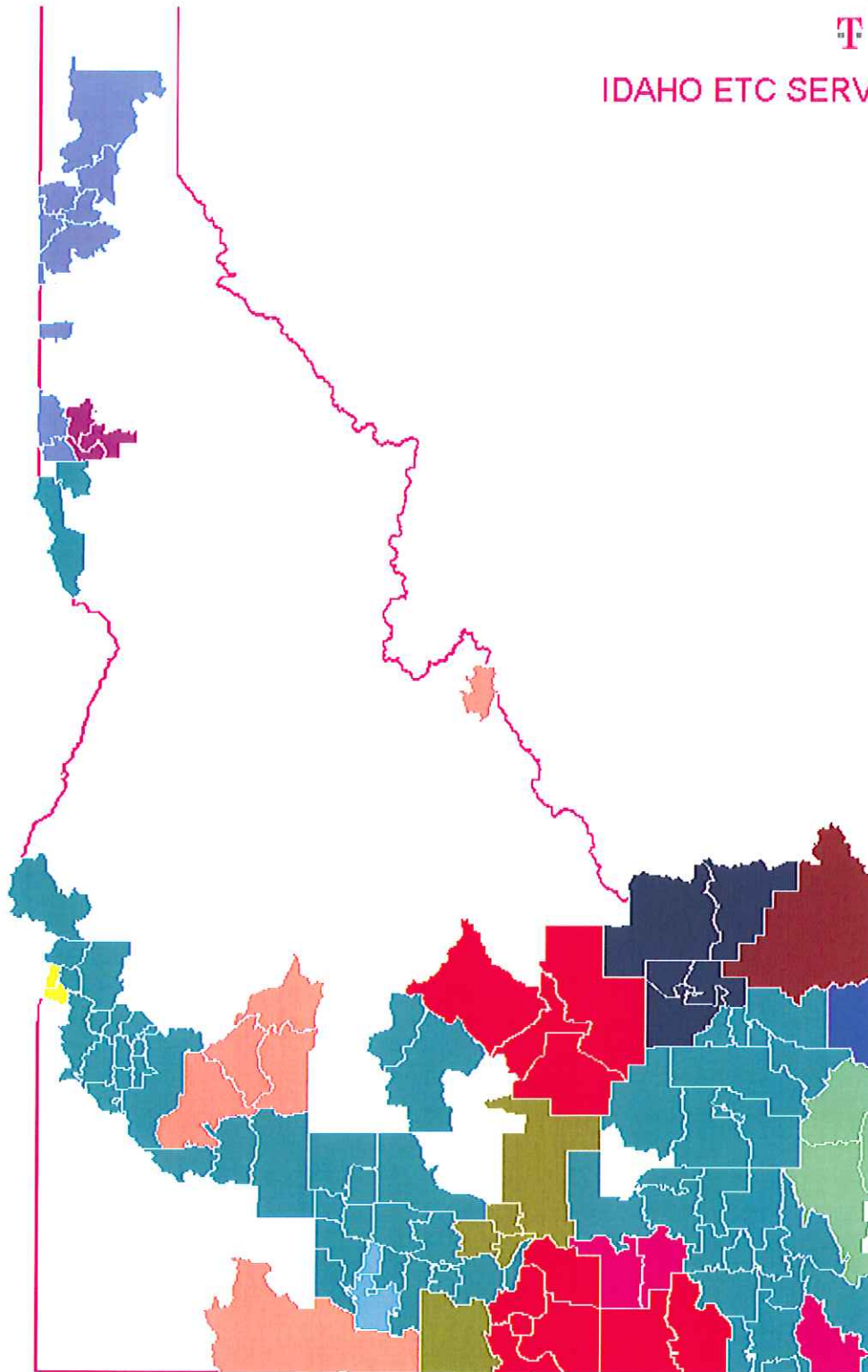
November 2010

Page 2

T-MOBILE IDAHO ETC SERVICE AREA

Non-Rural Telephone Company Wire Centers	Study Area Code (SAC)	Wire Center
		JERMIDNM
		KMBRIDMA
		KTCHIDMA
		KUNADMA
		LHSPIDMA
		LSMNIDMA
		MCCMIDMA
		MDTNIDMA
		MELBIDMA
		MRDNIDMA
		MRTGIDMA
		MTHOIDMA
		MTHOISO
		MTPLIDMA
		NMPAIDMA
		NPMOIDMA
		PCTLIDMA
		PCTLIDNO
		PSTNIDMA
		PYTTIDMA
		RBRTIDMA
		RCMDUTMA
		RGBYIDMA
		RIRIIDMA
		RVSDIDMA
		RXBGIDMA
		SDSPIDMA
		SHLYIDMA
		SHSHIDMA
		STARIDNM
		THTCIDMA
		TWFLIDMA
		WESRIDMA
		WNDLIDMA
		LAPWID01
		LSTNIDSH
		SPKNWAWA
Verizon	472416	BYVWIDXX
		CRALIDXX
		GENSIDXX
		HYLKIDXX
		MSCWIDXX
		PSFLIDXX
		RCFRWAXB
		RTHDIDXX
		SNPNIDXX
		RCFRWAXB

IDAHO ETC SERVICE AREA



Company / Study Area

■ ALBION TELEPHONE CO. DBA ATC COMMUNICATIONS	■ MUD LAKE TELEPHONE COOPERATIVE ASSOCIATION, INC.
■ DIRECT COMMUNICATIONS ROCKLAND, INC.	■ POTLATCH TELEPHONE CO., INC.
■ COLUMBINE TELCO DBA SILVER STAR COMMUNICATIPMS	■ PROJECT MUTUAL TELEPHONE COOP. ASSOCIATION, INC.
■ FARMERS MUTUAL TELEPHONE CO.	■ RURAL TELEPHONE CO.
■ FILER MUTUAL TELEPHONE CO.	■ SILVER STAR TELEPHONE CO., INC.
■ FREMONT TELCOM CO	■ QWEST CORPORATION
■ MALHEUR HOME TELEPHONE CO.	■ VERIZON NORTHWEST INC.-ID

Attachment D

Ability To Remain Functional In Emergency Situations Certification

T-Mobile is able to function in emergency situations as set forth in Section 54.201(a)(2), which includes “a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”¹ In particular, T-Mobile has the following capabilities to remain functional in emergency situations:

- Availability of fixed and portable back-up power generators at various network locations throughout T-Mobile’s network that can be deployed in emergency situations.
- Ability to reroute traffic around damaged or out-of-service facilities through the deployment of cell-on-wheels (“COWs”), redundant facilities, and dynamic rerouting of traffic over alternate facilities.
- A network control center that monitors network traffic and anticipates traffic spikes, and can then (i) deploy network facilities to accommodate capacity needs, (ii) change call routing translations, and (iii) deploy COWs to temporarily meet traffic needs until longer-solutions, such as additional capacity and antenna towers can be deployed.

¹ 47 C.F.R. § 54.202(a)(2).

- The majority of sites not equipped with fixed generators have battery back up systems installed to maintain service in the event of a widespread power outage.



Expanding the Wireless Frontier

Steve Largent
President/CEO

June 22, 2010

REC'D JUL 08 2010

Ms. Susan Hacker
Director of Legal Affairs &
Associate General Counsel
Sales & Distribution
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006

Dear Susan:

Congratulations! This letter is to notify you that T-Mobile USA ("T-Mobile") has completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2010 – December 31, 2010, and is deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, T-Mobile is authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of T-Mobile review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, we will provide two specimens (color and black/white) of the Seal for T-Mobile's use on its website or collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Andrea Williams, CTIA's Vice President of Law and Assistant General Counsel, at (202) 736-3215 or awilliams@ctia.org.

CTIA commends T-Mobile for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with T-Mobile on this important industry initiative.

Sincerely,

Steve Largent

Attachment

cc: Robert Dotson
Dave Miller



The McGraw-Hill Companies



Press Release

**J.D. Power and Associates Reports:
Wireless Customers Are Contacting Their Service Providers Through Retail and Online Channels
With Increasing Frequency**

T-Mobile Ranks Highest in Wireless Customer Care Performance

WESTLAKE VILLAGE, Calif: 29 July 2010 — Overall, wireless customers who contact their service provider for customer care are increasingly using contact channels other than the telephone, according to the J.D. Power and Associates 2010 U.S. Wireless Customer Care Performance StudySM—Volume 2 released today.

Now in its eighth year, the semiannual study provides a detailed report card on how well wireless carriers service their customers in three contact methods: telephone calls with a customer service representative (CSR) and/or automated response system (ARS); visits to a retail wireless store; and on the Web. Within each contact method, the study measures satisfaction and processing issues such as problem-resolution efficiency and hold-time duration.

The study finds that, compared with six months ago, there have been substantial increases in the proportion of wireless customers who use the retail store location and online/Web channels to seek customer care. During the first half of 2010, 29 percent of customers visited a retail store location regarding their most recent customer care inquiry or issue. In comparison, 26 percent of customers did the same between July and December 2009. The change is even greater among those customers who indicate they contacted their provider online either through e-mail or the website, as 11 percent overall report doing so in 2010, up from 9 percent in the last half of 2009.

"While a majority of customers—60 percent, on average—still use the telephone to contact their wireless carrier for customer care issues, it's clear that wireless subscribers are increasingly relying on other channels to resolve their customer service needs," said Kirk Parsons, senior director of wireless services at J.D. Power and Associates. "There are a number of reasons for this, such as an increase in retail store locations; the expansion and efficiency of online methods, especially the speed of communicating with a live representative via online chat messaging; and general overall improvement in satisfaction performance, especially within the retail store channel."

For example, the study finds that overall customer care performance scores among customers who visit a retail store location have significantly improved from six months ago. Overall satisfaction among these customers averages 775 on a 1,000-point scale—an increase of 23 index points. Customers are notably more satisfied when they resolve their issue by visiting a retail store than they are when they utilize other methods of contact.

"The walk-in experience is unique due to the physical nature of the experience and the immediacy of having an issue resolved in person," said Parsons. "It is critical, however, that the retail store representatives first focus their efforts on resolving the customer's core needs if that's the main reason for the visit, as first-contact resolution is critical to a superior customer care experience."

T-Mobile ranks highest in wireless customer care performance with an overall score of 777. T-Mobile performs particularly well in phone contacts that originate in the ARS channel and are then transferred to a live service

representative, and through phone calls made directly to a CSR. AT&T follows in the overall rankings with a score of 757 and performs well among customers who visit retail store locations and among customers who contact their carrier online.

The study also finds several key wireless customer care patterns:

- Overall, 39 percent of wireless customers contact their carrier due to service and equipment-related issues, while 34 percent contact for billing, 25 percent for incorrect charges, 23 percent for price or cost, 22 percent for call quality, 9 percent for messaging issues, 9 percent for network coverage, and 6 percent for credit issues.
- Wireless customers who have had a positive care experience are more loyal and are therefore less likely to switch carriers in the future, on average. Among customers who indicate they "definitely will not switch" carriers in the next 12 months, the customer care index averages 827, compared with just 602 among those who say they "definitely will switch"—a difference of 225 points.
- A vast majority of customers get through to their carrier on their first try (90%), but some customers (10%) are misdirected or are put on hold for too long and must make more than one contact. The average wireless customer spends 5.27 minutes on hold when trying to reach their carrier via phone.

The 2010 Wireless Customer Care Performance Study—Volume 2 is based on responses from 9,690 wireless customers who contacted their carrier's customer care department within the past six months. The study was fielded from January through June 2010.

For more information, to read an article, or [view wireless customer care ratings](#), please visit [JDPower.com](#).

About J.D. Power and Associates

Headquartered in Westlake Village, Calif., J.D. Power and Associates is a global marketing information services company operating in key business sectors including market research, forecasting, performance improvement, Web intelligence and customer satisfaction. The company's quality and satisfaction measurements are based on responses from millions of consumers annually. For more information on [car reviews and ratings](#), [car insurance](#), [health insurance](#), [cell phone ratings](#), and more, please visit [JDPower.com](#). J.D. Power and Associates is a business unit of The McGraw-Hill Companies.

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Founded in 1888, The McGraw-Hill Companies (NYSE: MHP) is a global information and education company providing knowledge, insights and analysis in the financial, education and business information sectors through leading brands including Standard & Poor's, McGraw-Hill Education, Platts, and J.D. Power and Associates. The Corporation has more than 280 offices in 40 countries. Sales in 2009 were \$5.95 billion. Additional information is available at <http://www.mcgraw-hill.com/>.

J.D. Power and Associates Media Relations Contacts:

John Tews; Troy, Mich.; (248) 312-4119; media.relations@jdpa.com

Syvrettil Perryman; Westlake Village, Calif.; (805) 418-8103; media.relations@jdpa.com

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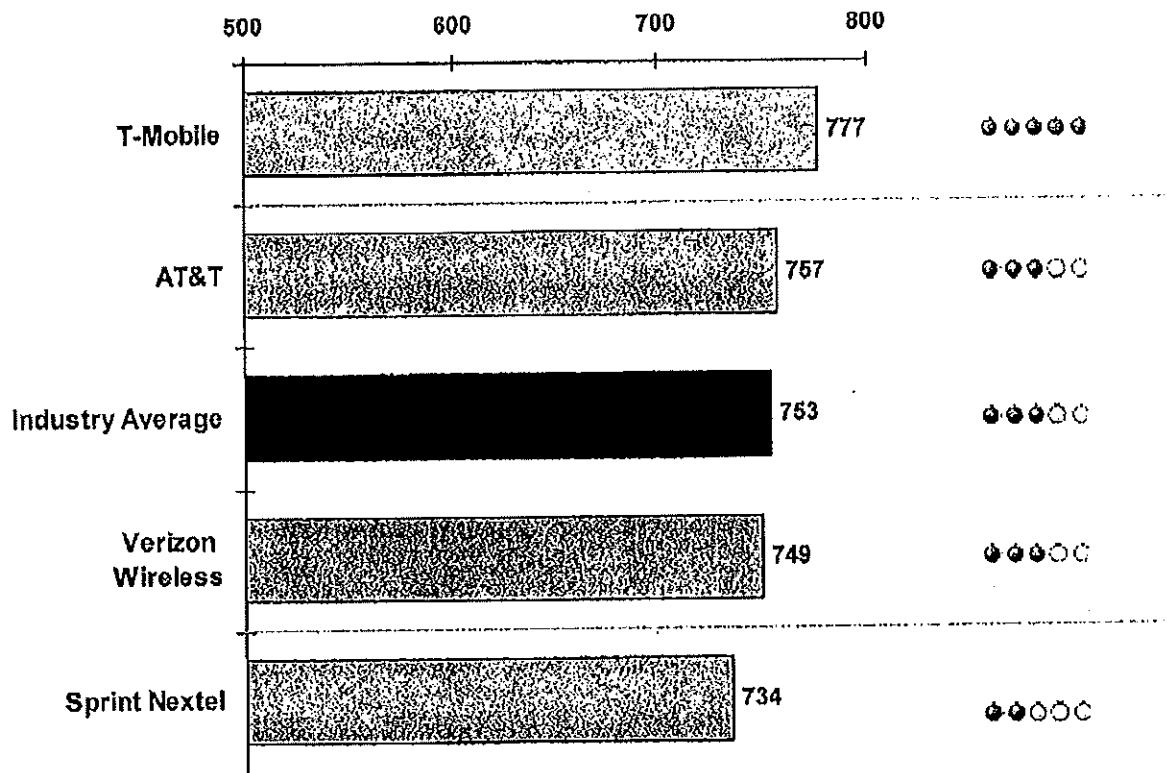
NOTE: One chart follows.

J.D. Power and Associates 2010 U.S. Wireless Customer Care Performance StudySM— Volume 2

Overall Customer Care Index Rankings

(Based on a 1,000-point scale)

JDPower.com
Power Circle RatingsTM
for consumers:



Power Circle Ratings Legend
○○○○○ Among the best
○○○○○ Better than most
○○○○○ About average
○○○○○ The rest

Source: J.D. Power and Associates 2010 U.S. Wireless Customer Care Performance StudySM—Volume 2

Charts and graphs extracted from this press release must be accompanied by a statement identifying J.D. Power and Associates as the publisher and the J.D. Power and Associates 2010 U.S. Wireless Customer Care Performance StudySM—Volume 2 as the source. Rankings are based on numerical scores, and not necessarily on statistical significance. JDPower.com Power Circle RatingsTM are derived from consumer ratings in J.D. Power studies. For more information on Power Circle Ratings, visit jdpower.com/faqs. No advertising or other promotional use can be made of the information in this release or J.D. Power and Associates survey results without the express prior written consent of J.D. Power and Associates.

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Press Release

J.D. Power and Associates Reports:

While Any Type of Sales Pressure Negatively Impacts Satisfaction with the Wireless Retail Sales Experience, Poor Treatment by Sales Staff is Particularly Dissatisfying for Customers

T-Mobile Ranks Highest in Wireless Retail Sales Satisfaction for a Third Consecutive Time

WESTLAKE VILLAGE, Calif: 12 August 2010 --- While overall satisfaction declines considerably when customers experience pressure during the wireless retail transaction, the degree to which satisfaction is impacted varies greatly depending on the reason for sales pressure, according to the J.D. Power and Associates 2010 U.S. Wireless Retail Sales Satisfaction StudySM—Volume 2 released today.

Now in its seventh year, the semiannual study analyzes evaluations from customers who recently had an in-store wireless retail sales experience. Overall customer satisfaction with major wireless carrier-branded stores is based on four factors. In order of importance, they are sales staff (49%); price and promotion (27%); store facility (14%); and store display (10%).

The study finds that satisfaction among customers who indicate having experienced pressure during the sales process averages 125 points lower (632 on a 1,000-point scale) than among customers who indicate not having experienced pressure (757 points).

More importantly, satisfaction levels vary greatly based on the cause of the sales pressure. For example, issues related to crowded stores (average satisfaction score of 642) or an insufficient number of salespeople (623) have less of an impact on the overall sales experience than how the salesperson treats the customer, such as being in a hurry to get to other customers (599) or not spending enough time to understand the customer's wireless needs (507).

"While only 16 percent of wireless customers report experiencing pressure during the sales transaction process, the financial impact may be considerable," said Kirk Parsons, senior director of wireless services at J.D. Power and Associates. "Customers who are pressured in some way are more than twice as likely to switch to another wireless provider, compared with customers who are not subject to any unnecessary sales pressure."

The study also finds that overall satisfaction with the retail sales process decreases dramatically when salespeople do not perform certain key activities. For instance, satisfaction averages 143 points lower among customers who indicate that a salesperson failed to offer to explain how to operate a phone than among customers who received explanations. There is also a 116-point difference when such service plan options as data plans are not explained, which is particularly important among smartphone owners and customers who purchase feature-rich handsets.

"It is critical that salespeople fulfill the basic needs of customers during every visit, but it is increasingly important for representatives to add value to the retail experience," said Parsons. "If the representative can optimize the customer's time in the store by informing them of new options or available features, the customer will leave with greater loyalty to the retailer and be more likely to return."

T-Mobile ranks highest in customer satisfaction among major wireless carrier-owned retail stores for a third consecutive time with a score of 744, performing particularly well in price and promotions and store facility, such as layout and convenient operating hours. Sprint Nextel (743) closely follows T-Mobile in the rankings and performs well in price and promotions.

The study also finds the following key retail wireless sales transaction patterns:

- Nearly three-fourths of customers indicate that a salesperson offered to explain how to operate the phone during their most recent visit—an increase of 4 percentage points, compared with six months ago. In addition, nearly two-thirds of customers indicate having discussed possible extra charges that may apply to the bill—an increase of 3 percentage points during the same time period.
- The average total reported time spent in the retail store to complete the sales transaction is approximately 56 minutes—a decrease of nearly three minutes, compared with just six months ago.
- Advertising has proven to be a key element in the wireless carrier selection process. Overall, 60 percent of wireless customers find advertising “extremely/very important” in choosing their current carrier.
- Nearly one-half (46%) of wireless customers visit their retailer to upgrade or replace a phone from their current carrier. Renewing or changing an existing wireless plan (31%) and inquiring about phone repair (25%) round out the top reasons customers cite for visiting a retail store within the past six months.

The 2010 U.S. Wireless Retail Sales Satisfaction Study—Volume 2 is based on experiences reported by 7,972 wireless customers who completed a retail sales transaction within the past six months. The study was fielded between January and June 2010.

For more information, to read an article or [view wireless retail ratings](#), please visit [JDPower.com](#).

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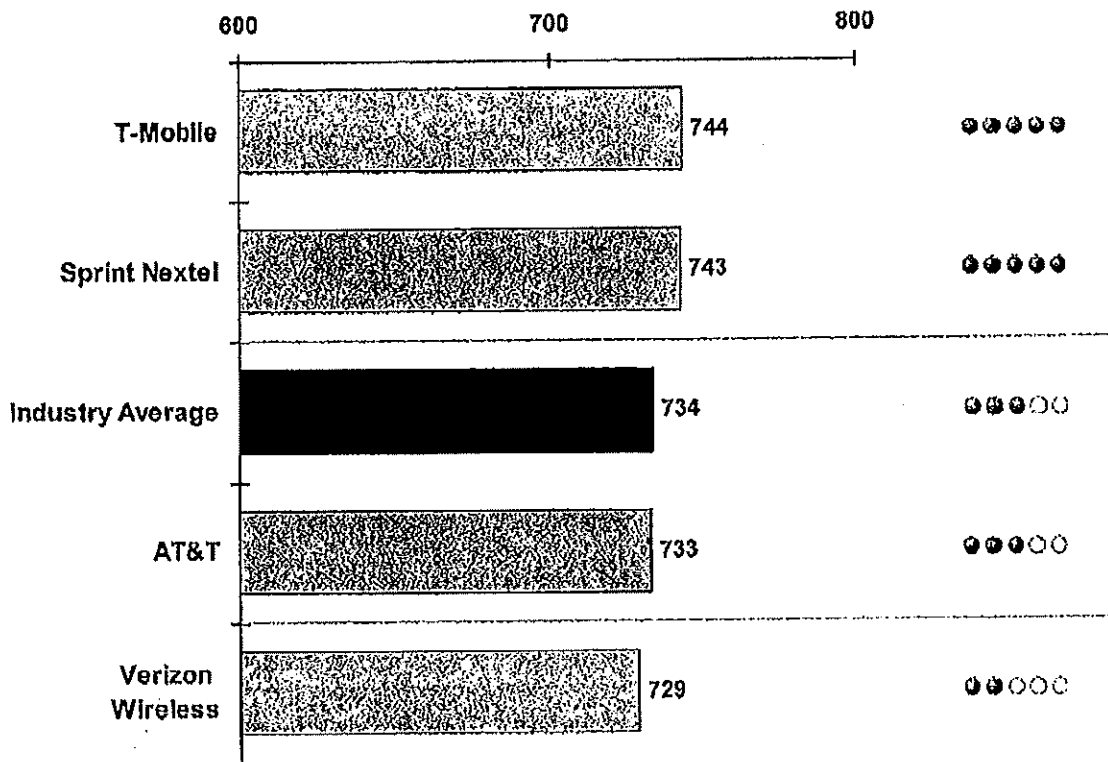
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

In the Matter of the Application of T-Mobile)
 West Corporation For Designation as an)
 Eligible Telecommunications Carrier)
 Pursuant to 47 U.S.C. § 214(e)(2))

Case No. TMW-T-10-01
 T-MOBILE APPLICATION

**APPLICATION FOR DESIGNATION AS AN
 ELIGIBLE TELECOMMUNICATIONS CARRIER**

**CERTIFICATION ON USE OF HIGH-COST UNIVERSAL SERVICE FUNDS IN
 ILEC AREAS PURSUANT TO 47 C.F.R. §§ 54.313 and 54.314**

I am H. Skip Cornett, Vice President of Tax for T-Mobile USA, Inc., which is the parent company of and controls T-Mobile West Corporation (hereinafter "T-Mobile") in this matter. I submit this certification in support of T-Mobile's petition for designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the Communications Act of 1934 ("petition").

In my capacity as Vice President of Tax for T-Mobile, I have general knowledge regarding its operation of commercial mobile radio services ("CMRS") in the State of Idaho, and its qualifications and abilities to provide CMRS-based Universal Service consistent with this petition.

T-Mobile will use its **HIGH-COST SUPPORT** only for the provision, maintenance and upgrading of facilities and services within the service area described in Attachment A to the referenced petition for which support is intended, consistent with Section 254(c) of the Communications Act, 47 U.S.C. § 254(e).

I am authorized to make this certification on behalf of T-Mobile.

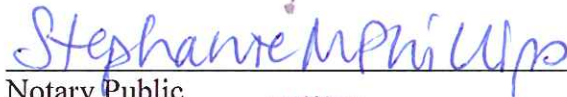
Signed,



H. Skip Cornett
Vice President, Tax
T-Mobile USA, Inc.
12920 SE 38th Street
Bellevue, WA 98006

STATE OF WASHINGTON
COUNTY OF KING

Acknowledged before me this 2nd day of December, 2010, by H. Skip Cornett, as Vice President, Tax of T-Mobile USA, Inc. who is personally known to me or produced identification and who did take an oath.



Notary Public

